

### REMARKS

In the Action mailed December 22, 2006, all pending claims 1-24 were rejected. In the amendments above Applicants have amended claims 1, 11, 23 and 24. As such, claims 1-24 remain pending. Applicants respectfully request reconsideration in view of the amendments above and the following remarks.

#### **Claim Rejections – 35 USC 102 and 103**

Claims 1, 4, 6, 8, 10, 11, 14, 15, 17, 18, 20, 23 and 24 stand rejected under 35 U.S.C. 102(e) as being anticipated by Peterson et al. (US 6,366,302). Of these claims 1, 11, 23 and 24 are independent claims. The remaining dependent claims 2-3, 5, 7, 9, 12-13, 16, 17, 19, 21 and 22 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Peterson in view of various other references.

Applicants have amended each of the independent claims 1, 11, 23 and 24 to define more particularly the subject matter sought to be patented. The amendments add no new matter.

Applicants submit that each of the independent claims 1, 11, 23 and 24 defines subject matter that is patentable over Peterson, as do the dependent claims. In addition, the secondary references cited in connection with the rejected dependent claims do not cure the deficiencies of Peterson vis-à-vis the rejected independent claims.

Peterson relates to assisting a translation of an original document from an original language into a translation language. (Abstract.) Peterson discloses techniques that are said to leverage previously translated documents and provide linguists with the context needed to improve efficiency and quality of resulting translations. (Abstract.) Peterson discloses that a format structure of original documents are each extracted as a tree structure of one or more nodes identifying text and formatting codes in the original document. (Col. 1, lines 45-48.) Peterson discloses that potential leveraging opportunities are identified by comparing document content identified by nodes of the tree structures extracted from a first original document to be translated and a second original document that already has a counterpart translation document. (Col. 1, line 66 to col. 2, line 14.) Peterson discloses that portions of the counterpart translation document

corresponding to one or more identified portions of the second original-language document matching corresponding portions of the original language document are displayed. (Col. 2, lines 14-19.)

Peterson further discloses that document content is displayed in accordance with the tree structure extracted from the original document. (Col. 2, lines 20-21.) Peterson further discloses, in Figure 6, a graphical user interface including a scrollable window 102 in which the text of a document to be translated is displayed. (Col. 5, lines 64-66.) Peterson discloses that the corresponding translation text is displayed in a second scrollable window 104. (Col. 5, lines 66-67.) Peterson also discloses that user-selected original language text is reproduced in an original language edit window 106, a linguist may enter translation text in a translation language edit window 108, and potential leveraging opportunities are displayed in a suggested translation edit window 110. (Col. 2, lines 21-26; col. 5, line 67 to col. 6, line 5.)

Peterson does not disclose or suggest the subject matter of Applicants' claim 1, as amended. First, Peterson does not relate to, as is recited in claim 1, the translation of "a call center application script of words to later be displayed to and spoken by a call center agent during an interactive session with a customer," which includes "different, distinct portions." Peterson does not address the translation of this specific type of script of words. This is not a trivial distinction. Call center application scripts have different, distinct portions that are not necessarily spoken in a particular order. During an interaction session, for example, a call center agent may speak one portion of the script, and then depending on how the customer responds, the call center agent may go to various different other different, distinct script areas. This nature of the call center application script raises special challenges in translating the script. Namely, the script is not amenable to being displayed in an entire document, and further, there is no real order to the call center application script, and thus it is best displayed as separate, distinct portions.

In addition to not relating to the translation of call center application scripts that have different, distinct portions, Peterson moreover does not disclose or suggest a graphical user interface that includes, as recited in claim 1, "a first set of multiple distinct script areas that are each capable of providing within the scrip area a textual display of a different, distinct portion of

the call center application script in a first language, and “a second set of multiple distinct script areas that are each capable of providing within the script area a textual display of a different, distinct portion of the call center application script in a second language, wherein ... each distinct script area in the first set has a spatial relationship with a distinct script area in the second set that corresponds to the same distinct portion of the call center application script.”

To the contrary, although Peterson discloses, in Figure 6, an original language area 106 that is capable of displaying a portion of the text of a document in a first language and a translation language area 108 in which a translation of the text in area 106 may be displayed, Peterson does not disclose or suggest, as recited in claim 1, “multiple distinct script areas that each capable of providing within the scrip area a textual display of a different, distinct portion of the call center application script.” Rather, Peterson only shows one script area of each set. In addition, Peterson's areas 102 and 106 cannot be considered “a first set of multiple distinct script areas” because these script areas, although they display text of a document in the same language, are not each “a different, distinct portion of the call center application script.” The same is true for Peterson's areas 104 and 108.

Peterson also does not render Applicants' claim 1 obvious. As mentioned above, a call center application script of words, by the nature of the script, poses special challenges in translating the document. In particular, it is easy for a translator to get lost in the decision tree of different, distinct portions of the script and forget to translate one or more portions of the script. This is addressed by Applicants' claimed subject matter by having two sets of multiple distinct areas that are displayed in spatial relationship with one another. This is not the case with Peterson. Moreover, Peterson does not address the specific challenges of translating call center application scripts that is addressed by Applicants' claimed subject matter.

For these reasons, Applicants submit that claim 1 defines subject matter that is patentable over Peterson. In addition, none of the secondary references cited in connection with claims that depend from claim 1 address the deficiencies of claim 1. In addition, independent claims 11, 23 and 24 each define subject matter that is patentable over Peterson and any of the cited secondary references for at least the reasons discussed above in connection with claim 1.

Accordingly, Applicants respectfully request that the rejections of claims 1-24 be withdrawn.

### Conclusion

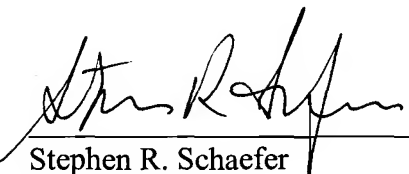
Applicants submit that claims 1-24 are in condition for allowance, and requests that the Examiner issue a notice of allowance.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Examiner is authorized to charge Deposit Account No. 06-1050 \$1020 for the Petition for Extension of Time fee. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: June 21, 2007



Stephen R. Schaefer  
Reg. No. 37,927

Fish & Richardson P.C.  
60 South Sixth Street  
Suite 3300  
Minneapolis, MN 55402  
Telephone: (612) 335-5070  
Facsimile: (612) 288-9696